

Albert Russo, Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650
(609) 587-6888

In re:	:	UNITED STATES BANKRUPTCY COURT
	:	District of New Jersey
	:	Trenton Vicinage
Candido Ortiz	:	
	:	
	:	CHAPTER 13 CASE NO. 14-31613 / KCF
	:	
	:	Hearing Date: December 10, 2014 9:30 am
	:	Honorable Kathryn C. Ferguson
Debtor(s)	:	

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objections to the Debtor(s) Plan for the following reason(s):

The debtor has insufficient income to fund the plan..

Proof of Rental Income

The debtor(s) must supply the Trustee with the following document(s):

A Modified Plan that provides for clarification regarding discharge.

Amendments to Schedules B22 to include income

The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4):

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: Erik Collazo